

3:15-cr-276-B

NORTHERN DISTRICT OF TEXAS

FILED

MAY - 4 2020

CLERK, U.S. DISTRICT COURT

By

Deputy

I, inmate Michael Carr #49542-177, am writing this motion to petition for a ~~3582~~ ^{Compassionate} Release with Home Confinement. I have already requested through the warden of my FMC but due to the increasingly volatile environment of FMC Ft. Worth during this COVID-19 Pandemic (3 deaths and the highest infection rate in the BOP) I move for an exemption from the 30 day response period, following precedence set in *US v. Sawicz*

I am currently a care level 3 medical patient with severely brittle type 1 diabetes, hypertension and hyperthyroidism, all of which I am on treatment for and contribute to a compromised immune system leaving me susceptible to the COVID-19 virus which has struck FMC Ft Worth, creating an unsafe situation. In addition, with staff and supply shortages, already insulin provision has been delayed and outright skipped on occasion. I fear for my life and continued medical care. In addition, my mother, to whom I am her only child, has just turned 66 and is an equally susceptible diabetic. Should she become unable to work, I wish to support her.

My release plan is as follows:

I have offers to stay with family. My mother, who lives alone in distance according to my future probation needs, has offered her home, the same goes for my Uncle and Aunt. I will obtain medical supplies through federal mandated insurance until I gain a plan through employment. With a college degree education and years of programming, VT courses and work experience at Unicon through the BOP, I have no concerns finding gainful employment. I have proven I am no troublemaker (receiving a single incident report in my 5+ years incarcerated for missing pill line in 2018) and will be able to follow all release stipulations.

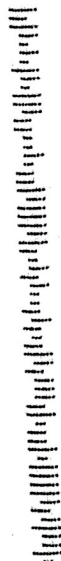
I am a model inmate who has held a job my entire time incarcerated, have programmed, kept ties with family and friends, am a low security first time offender with camp points eligible for the First Step Act and am at severe medical risk having come to this facility two months ago from a lower care level facility for my health and am now confined to the institution with the highest infection rate in the BOP. My reasons for this motion are clear. I will follow all requirements and have done all I can to better myself in BOP custody. I just want a chance to live. Thank you.

-Inmate Michael Carr #44542-177 - 

Michael Carr # 49542-177 Dallas
Ft. Worth Federal Medical Center
PO Box 15330
Ft. Worth, TX 76119

MAY - 4 2020

75242-131052



NORTH TEXAS TX P&DC
DALLAS TX 750
29 APR 2020 PM 8 L



Clerk for the Northern District of TX
1100 Commerce St. #1452
Dallas, TX 75242